

REMARKS

Claims 1-30 are pending in the present patent application. Claims 1-30 stand rejected. By this Amendment, claims 1, 4, 7, and 16 have been amended. This application continues to include claims 1-30.

The Examiner objected to claims 10, 19, and 30, where in the opinion of the Examiner, the phrase “is effected by” is grammatically incorrect, and should be “is affected by”. It is respectfully submitted, however, that the use of the term “is effected by” in the context of claims 10, 19 and 30 is grammatically correct. The term “is effected by” means to “cause to come into being”, i.e., to bring about a result. (See, for example, Merriam-Webster On-Line, definition for “effected”). In contrast, the term “is affected by” is commonly used to mean “to influence”. In the context of claims 10, 19, and 30, the rotation of the second cam arm is effected by (i.e., caused to come into being; brought about as a result of) a corresponding rotation of an interior operator. Accordingly, Applicant believes claims 10, 19 and 30 are in proper grammatical form, and it is respectfully requested that the Examiner withdraw the objection to claims 10, 19 and 30.

**Applicant's Response To The Rejection Of Claims 1-30**

The Examiner rejected claims 1-14, 16-23, 25-27 and 29-30 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,156,541 (Babb). Applicant respectfully disagrees.

As stated in the prior response, Babb uses common element numbers to refer to different components, and different element numbers to refer to the same component. While the Examiner relies on the Babb reference to spring guides 75 (Fig. 1C; column 3, line 45), it appears that in Babb the reference to spring guides 74 (Fig. 7, 8; column 4, line 7) is the more predominant reference to spring guides, and thus it is concluded that the reference in Babb to spring guides 75

should have been spring guides 74. Nonetheless, for purpose of this response the Examiner's reference to spring guides 75 equates to a reference to spring guides 74. More particularly, however, the brief reference to spring guides 75 in Fig. 1C shows that the spring guides are separate components from either the slide 70 (Fig. 1B) or the mount plate 72 (Fig. 1B).

The section view of Babb Fig. 7 taken along plane VII-VII of Fig. 3 shows a section through a central portion of spring guides 74, and clearly shows that spring guides 74 totally surround springs 72 in that region, and shows that the spring guides 74 surrounding springs 72 are in direct contact with mounting plate (72). Slide plate 70 is also shown. Referring now to Fig. 3, it is clear that slide plate 70 is positioned between the two horizontally spaced and vertically extending discrete spring guides 74.

Babb Fig. 8 taken along plane VIII-VIII of Fig. 3 shows a section through an extreme top portion of spring guides 74, but passing through an upper region of slide plate 70 between slide shoulders 70a and horizontal flanges 70d (see Fig. 1B and Fig. 3). Thus, no part of slide plate 70 is used in retaining springs 72 from lateral motion, and no part of slide plate 70 defines a spring retention wall which in conjunction with the mounting plate (72) defines a spring retention chamber.

Babb further discloses at column 4, lines 4-7 that, "Slide plate 70 reciprocates vertically, being biased upwardly by springs 72 which have their upper ends abutting slide shoulders 70a and their lower ends abutting against the closed lower ends of spring guides 74." Accordingly, spring guides 74 are clearly separate from slide plate 70 so as to provide the intended biasing effect. In addition, it is clear that slide shoulders 70a of slide plate 70 facilitate vertical containment of the associated springs in conjunction with the closed lower ends of spring guides 74, but do not provide any lateral containment.

Applicant's claim 1 is directed to an interconnected chassis for a lock set. Claim 1 has been amended to clarify that it is the slide plate and the mounting plate that define the spring retention chamber, and not an external component such as spring guide 74 (75) of Babb. In particular, claim 1 as amended, recites in part, "a slide plate having a spring retention wall and a spring engaging surface, ... and said slide plate and said mounting plate having a configuration that forms a spring retention chamber established between said spring retention wall of said slide plate and said mounting plate, said spring retention chamber providing lateral containment of said spring, said spring being positioned in said spring retention chamber between said spring engaging member of said mounting plate and said spring engaging surface of said slide plate." (Emphasis added).

The Examiner asserts that the slide shoulder 70a of Babb correspond to Applicant's recited spring retention wall of the slide plate. However, the Examiner recognizes in the "Response to Arguments" section of the present application at the second full paragraph on page 11 that, "the spring guide completely encompasses the spring, and thus provides lateral stability for the spring, wherein the spring retention chamber is disposed between the mounting plate and the slide plate . . . ." (Emphasis added). Accordingly, as further recognized by the Examiner, the slide shoulder 70a of slide plate 70 of Babb and mounting plate (72) of Babb would not provide lateral containment of the spring, since lateral containment is provided by spring guide 74 (75).

Further, Applicant's claims do not recite that "a spring retention chamber is disposed between the mounting plate and the slide plate," which in Babb constitutes a separate device positioned between the mounting plate and the slide plate. Rather, and in contrast to Babb, for example, claim 1 specifically recites "a slide plate having a spring retention wall" and a "spring retention chamber established between said spring retention wall of said slide plate and said

mounting plate” which constitutes the formation of the spring retention chamber by the spring retention wall of the slide plate and the mounting plate. (Emphasis added).

Accordingly, for at least the reasons set forth above, Babb does not disclose, teach or suggest the subject matter of claim 1. Accordingly, claim 1 is believed allowable in its present form.

Claims 2 and 3 are believed allowable due to their dependence, either directly or indirectly, from claim 1. In addition, claims 2 and 3 further and patentably define the present invention over Babb.

Claim 4 is directed to a method for providing an interconnected chassis for a lock set. Like claim 1, claim 4 has been amended to clarify that it is the slide plate and the mounting plate that define the spring retention chamber. Claim 4 recites, among other things, “establishing a spring retention chamber between said spring retention wall of said slide plate and said mounting plate, said slide plate and said mounting plate having a configuration that forms said spring retention chamber, said spring retention chamber providing lateral containment of a spring, said spring being positioned in said spring retention chamber between said spring engaging member of said mounting plate and said spring engaging surface of said slide plate.” (Emphasis added).

Applicant contends that Babb does not disclose, teach or suggest the subject matter of claim 4 for substantially the same reasons set forth above with respect to claim 1. Accordingly, claim 4 is believed allowable in its present form.

Claims 5 and 6 are believed allowable due to their dependence, either directly or indirectly, from claim 4. In addition, claims 5 and 6 further and patentably define the present invention over Babb.

Claim 7 is directed to a lock set with an interconnected chassis. Like claim 1, claim 7 has been amended to clarify that it is the slide plate and the mounting plate that define the spring retention chamber. Claim 7 recites, among other things, “a slide plate having .... an interior region located between said first cam arm engagement member and said second cam arm engagement member, said interior region of said slide plate having a first spring retention wall and a first spring engaging surface, ...; and said slide plate and said mounting plate having a configuration that forms a first spring retention chamber established between said first spring retention wall of said slide plate and said mounting plate, said first spring retention chamber providing lateral containment of said first compression spring, said first compression spring being positioned in said first spring retention chamber between said first spring engaging member of said mounting plate and said first spring engaging surface of said slide plate.” (Emphasis added).

Applicant contends that Babb does not disclose, teach or suggest the subject matter of claim 7 for substantially the same reasons set forth above with respect to claim 1.

In addition, Babb does not disclose, teach or suggest that the interior region of the slide plate has a first spring retention wall and a first spring engaging surface. As shown in Babb Fig. 1B, the slide shoulder 70a of slide plate 70 of Babb which the Examiner contends corresponds to Applicant's spring retention wall is not in an interior region of slide plate 70, but rather, is in the exterior perimeter of slide plate 70.

The Examiner, in the paragraph bridging pages 11 and 12 of the Office Action, states that, “As defined by the applicant, the interior region is located between the first and second cam arm engagement members, where the spring retention member of Babb, Jr. et al. is disclosed between the first cam arm engagement member and the second cam arm engagement member, as shown in figure 3.” However, as further set forth for example, in claim 7, the interior region of the slide

plate has a first spring retention wall, wherein a first spring retention chamber is established between the first spring retention wall of the slide plate and the mounting plate. Moreover, as the Examiner recognizes in the “Response to Arguments” section of the present application at the first full paragraph on page 11 that, “the spring guide [74/(75)] completely encompasses the spring, and thus provides lateral stability for the spring, wherein the spring retention chamber is disposed between the mounting plate and the slide plate.” (Emphasis added).

Accordingly, claim 7 is believed allowable in its present form.

Claims 9-14 are believed allowable due to their dependence, either directly or indirectly, from claim 7. In addition, claims 9-14 further and patentably define the present invention over Babb.

For example, claim 11 recites, “The lock set of claim 7, said first spring retention wall defining a first elongated cavity in said slide plate.” However, neither slide plate 70 nor drive plate 104, which the Examiner contends corresponds to the “slide plate” in Applicant’s claims, define a spring retention wall defining a first elongated cavity in the slide plate. Nothing in Babb discloses, teaches or suggests that either of slide plate 70 or drive plate 104 define a spring retaining wall in the interior region of the slide plate (see claim 7) that defines an elongated cavity in the slide plate.

In the present Office Action at page 12, second full paragraph, the Examiner responds to Applicant’s contention that Babb does not disclose a spring retaining wall on the slide plate that defines an elongated cavity in the slide plate by again relying on Babb Fig. 1B.

As a first point, nothing in the structure shown in Fig. 1B resembles a spring retention wall defining a first elongated cavity in said slide plate. Merriam-Webster Online defines “cavity” as “an unfilled space within a mass; *especially*: a hollowed-out space” (emphasis added).

Referring to Applicant's Fig. 2, there is shown elongated cavities 136a, 136b which satisfy the definition recited above. However, there is no such corresponding structure in slide plate 70 or drive plate 104 of Babb Fig. 1B.

As a second point, as recognized by the Examiner, the Babb spring guide completely encompasses the spring. Babb Fig. 1B shows the configuration of the slide 70. What Fig. 1B does not show, however, is the arrangement of slide 70 with respect to the springs, and spring guide 74 which surrounds the spring. This arrangement is clearly shown in Babb Fig. 7, and it is then clear that slide 70 of Babb does not include a spring retention wall.

As set forth above, and which bears repeating now, Babb states at column 4, lines 4-7, "Slide plate 70 reciprocates vertically, being biased upwardly by springs 72 which have their upper ends abutting slide shoulders 70a [of slide 70] and their lower ends abutting against the closed lower ends of spring guides 74." Thus, the spring guide 74 that completely encompasses the spring and having the closed lower ends cannot be formed as part of the slide 70, since to do so would render the structure of Babb inoperable. In other words, if the spring guide 74 was part of slide 70, then both ends of the spring 72 would be engaged by slide 70, and no biasing of slide 70 would occur, since the spring would be captive between opposing ends of the slide. Thus, in the arrangement disclosed in Babb, it is necessary for the spring guide that completely encompasses the spring to be separate from the slide 70 in order for the spring 72 to properly apply a bias to slide 70.

Thus, Babb does not disclose, teach or suggest "said first spring retention wall defining a first elongated cavity in said slide plate", as recited in claim 11. Accordingly, claim 11 is believed allowable in its own right.

Claim 12 recites, “The lock set of claim 7, further comprising a second spring engaging member formed at said mounting plate and spaced apart from said first spring engaging member; a second spring retention wall formed at said slide plate; a second spring engaging surface formed at said slide plate; a second compression spring; and a second spring retention chamber established between said second spring retention wall of said slide plate and said mounting plate, said second spring retention chamber providing lateral containment of said second compression spring, said second compression spring being positioned in said second spring retention chamber between said second spring engaging member of said mounting plate and said second spring engaging surface of said slide plate.” Babb does not disclose the second spring/second spring retention wall/second spring retention chamber arrangement as recited in claim 12 for substantially the same reasons set forth above, that Babb does not disclose, teach or suggest the first spring/first spring retention wall/first spring retention chamber arrangement as set forth in claim 7, with reference to the arguments associated with claim 1.

Accordingly, claim 12 is believed allowable in its own right.

Claim 13 recites, “The lock set of claim 12, said second spring retention wall defining a second elongated cavity in said slide plate.” However, neither slide plate 70 nor drive plate 104 of Babb, which the Examiner contends corresponds to the “slide plate” in Applicant’s claims, define a spring retention wall defining a second elongated cavity in the slide plate. Furthermore, nothing in Babb discloses, teaches or suggests that either of slide plate 70 or drive plate 104 define a spring retaining wall of the slide plate that defines an elongated cavity in the slide plate.

Accordingly, claim 13 is believed allowable in its own right.

Claim 14 recites, “The lock set of claim 7, further comprising: an opening formed through said second cam arm along said second rotational axis; and an operator having a mounting portion



and a split half-round spindle, said mounting portion being positioned in said opening and attached to said second cam arm.” The Examiner identifies spindle 88 of Babb as corresponding to the recited split half-round spindle. However, spindle 88 is a square spindle (see Babb Figs. 1C and 3). Babb does not disclose, teach or suggest an operator having a mounting portion and a split half-round spindle, the mounting portion being positioned in the opening and attached to the second cam arm, as recited in claim 14.

Accordingly, claim 14 is believed allowable in its own right.

Claim 16 is directed to a method for providing a lock set with an interconnected chassis. Like claim 1, claim 16 has been amended to clarify that it is the slide plate and the mounting plate that define the spring retention chamber. Claim 16 recites, among other things, “configuring a mounting plate for attachment to a door, ...forming a slide plate having ... an interior region located between said first cam arm engagement member and said second cam arm engagement member, said interior region of said slide plate having a first spring retention wall and a first spring engaging surface;... establishing a first spring retention chamber between said first spring retention wall of said slide plate and said mounting plate, said slide plate and said mounting plate having a configuration that forms said first spring retention chamber, said first spring retention chamber providing lateral containment of a first compression spring; and positioning said first compression spring in said first spring retention chamber, and between said first spring engaging member of said mounting plate and said first spring engaging surface of said slide plate.” (Emphasis added).

Applicant contends that Babb does not disclose, teach or suggest the subject matter of claim 16 for substantially the same reasons set forth above with respect to claim 7 and/or claim

11, which includes the arguments relating to claim 1. Accordingly, claim 16 is believed allowable in its present form.

Claims 17-23 are believed allowable due to their dependence, either directly or indirectly, from claim 16. In addition, claims 17-23 further and patentably define the present invention over Babb.

For example, claim 20 recites, “The method of claim 16, said first spring retention wall defining a first elongated cavity in said slide plate.” However, neither slide plate 70 nor drive plate 104 of Babb, which the Examiner contends corresponds to the “slide plate” in Applicant’s claims, define a spring retention wall defining a first elongated cavity in the slide plate. Furthermore, nothing in Babb discloses, teaches or suggests that either of slide plate 70 or drive plate 104 define a spring retaining wall in the interior region of the slide plate (see claim 16) that defines an elongated cavity in the slide plate.

Accordingly, claim 20 is believed allowable in its own right.

Claim 21 recites, “The method of claim 16, further comprising the steps of: forming a second spring engaging member at said mounting plate and spaced apart from said first spring engaging member; forming a second spring retention wall at said slide plate; forming a second spring engaging surface at said slide plate; and establishing a second spring retention chamber between said second spring retention wall of said slide plate and said mounting plate, said second spring retention chamber providing lateral containment of a second compression spring, said second compression spring being positioned in said second spring retention chamber between said second spring engaging member of said mounting plate and said second spring engaging surface of said slide plate.” Babb does not disclose the second spring/second spring retention wall/second spring retention chamber arrangement as recited in claim 21 for substantially the same reasons set

forth above, e.g., that Babb does not disclose, teach or suggest the first spring/first spring retention wall/first spring retention chamber arrangement as set forth in claim 16, with reference to the arguments associated with claims 1 and 7.

Accordingly, claim 21 is believed allowable in its own right.

Claim 22 recites, “The method of claim 21, said second spring retention wall defining a second elongated cavity in said slide plate.” However, neither slide plate 70 nor drive plate 104 of Babb, which the Examiner contends corresponds to the “slide plate” in Applicant’s claims, define a spring retention wall defining a second elongated cavity in the slide plate. Furthermore, nothing in Babb discloses, teaches or suggests that either of slide plate 70 or drive plate 104 define a spring retaining wall in the interior region of the slide plate (see claim 16) that defines an elongated cavity in the slide plate.

Accordingly, claim 22 is believed allowable in its own right.

Claim 23 recites, “The method of claim 16, further comprising the steps of: forming an opening in said second cam arm along said second rotational axis; and positioning a mounting portion of an operator having a split half-round spindle in said opening and attaching said mounting portion to said second cam arm.” The Examiner identifies spindle 88 of Babb as corresponding to the recited split half-round spindle. However, spindle 88 is a square spindle (see Babb Figs. 1C and 3). Babb does not disclose, teach or suggest an operator having a mounting portion and a split half-round spindle, the mounting portion being positioned in the opening and attached to said second cam arm, as recited in claim 23.

Accordingly, claim 23 is believed allowable in its own right.

Claim 25 is directed to an interconnected chassis for a lock set. Claim 25 recites, among other things, “a mounting plate configured for attachment to a door, ... a first compression spring;

and a slide plate having ... an interior region between said first end and said second end, ... said interior region of said slide plate having at least a first spring retention housing, said first spring retention housing having a first elongated cavity defined by a first spring retention wall and having a first spring engaging surface, said first elongated cavity of said slide plate cooperating with said mounting plate to define a first spring retention chamber that provides lateral containment and support of said first compression spring, said first compression spring being positioned between said first spring engaging member of said mounting plate and said first spring engaging surface of said slide plate, said first compression spring biasing said second cam arm engagement member of said slide plate into engagement with said second cam arm.” (Emphasis added).

Applicant contends that Babb does not disclose, teach or suggest the subject matter of claim 25 for substantially the same reasons set forth above with respect to claim 7, which includes arguments relating to claim 1.

In addition, Babb does not disclose, teach or suggest “said slide plate having at least a first spring retention housing, said first spring retention housing having a first elongated cavity defined by a first spring retention wall....” In the present Office Action at page 12, second full paragraph, the Examiner responds to Applicant’s contention that Babb does not disclose a spring retaining wall on the slide plate that defines an elongated cavity in the slide plate by again relying on Babb Fig. 1B. Independent claim 25 recites the “first elongated cavity of said slide plate [i.e., the first elongated cavity defined by a first spring retention wall and having a first spring engaging surface,] cooperating with said mounting plate to define a first spring retention chamber...”, which constitutes the formation of the spring retention chamber by the first elongated cavity of the slide plate and the mounting plate.

As a first point, nothing in the structure shown in Fig. 1B resembles a spring retention wall defining a first elongated cavity in said slide plate. Merriam-Webster Online defines “cavity” as “an unfilled space within a mass; *especially*: a hollowed-out space” (emphasis added). Referring to Applicant’s Fig. 2, there is shown elongated cavities 136a, 136b which satisfy the definition recited above. However, there is no such corresponding structure in the slide plate 70 or drive plate 104 of Babb Fig. 1B.

As a second point, as recognized by the Examiner, the Babb spring guide completely encompasses the spring. Babb Fig. 1B shows the configuration of the slide 70. What Fig. 1B does not show, however, is the arrangement of slide 70 with respect to the springs, and spring guide 74 which surrounds the spring. This arrangement is clearly shown in Babb Fig. 7, and it is then clear that slide 70 of Babb does not include a spring retention wall.

As set forth above, and which bears repeating now, Babb states at column 4, lines 4-7, “Slide plate 70 reciprocates vertically, being biased upwardly by springs 72 which have their upper ends abutting slide shoulders 70a [of slide 70] and their lower ends abutting against the closed lower ends of spring guides 74.” Thus, the spring guide 74 that completely encompasses the spring and having the closed lower ends cannot be formed as part of the slide 70, since to do so would render the structure of Babb inoperable. In other words, if the spring guide 74 was part of slide 70, then both ends of the spring 72 would be engaged by slide 70, and no biasing of slide 70 would occur, since the spring would be captive between opposing ends of the slide. Thus, in the arrangement disclosed in Babb, it is necessary for the spring guide that completely encompasses the spring to be separate from the slide 70 in order for the spring 72 to properly apply a bias to slide 70.

Thus, while the spring guides 74 of Babb may generally correspond to a “spring retention housing”, the spring guides 74 are not a part of the slide plate 70 of Babb, as recited in claim 25. Babb discloses at column 4, lines 4-7 that, “Slide plate 70 reciprocates vertically, being biased upwardly by springs 72 which have their upper ends abutting slide shoulders 70a and their lower ends abutting against the closed lower ends of spring guides 74.” Accordingly, spring guides 74 are necessarily separate from with slide plate 70 so as to provide the intended biasing effect on slide plate 70 (see also Babb Figs. 3 and 7).

Accordingly, claim 25 is believed allowable in its present form.

Claims 26, 27, 29 and 30 are believed allowable due to their dependence, either directly or indirectly, from claim 25. In addition, claims 26, 27, 29 and 30 further and patentably define the present invention over Babb.

For example, claim 26 recites, “The interconnected chassis of claim 25, further comprising: said mounting plate including a second spring engaging member horizontally spaced apart from said first spring engaging member; a second compression spring; and said slide plate having a second spring retention housing, said second spring retention housing having a second elongated cavity defined by a second spring retention wall and having a second spring engaging surface, said second elongated cavity of said slide plate cooperating with said mounting plate to define a second spring retention chamber that provides lateral containment and support of said second compression spring, said second compression spring being positioned between said second spring engaging member of said mounting plate and said second spring engaging surface of said slide plate, said first compression spring and said second compression spring biasing said second cam arm engagement member of said slide plate into engagement with said second cam arm.”

Babb does not disclose the second spring/second spring retention wall/second spring retention chamber arrangement as recited in claim 26 for substantially the same reasons set forth above, that Babb does not disclose, teach or suggest the first spring/first spring retention wall/first spring retention chamber arrangement as set forth in claim 25, with reference to the arguments associated with claims 1 and 7.

Accordingly, claim 26 is believed allowable in its own right.

Claim 27 recites, "The interconnected chassis of claim 25, further comprising: an opening formed through said second cam arm along said second rotational axis; and an operator having a mounting portion and a split half-round spindle, said mounting portion being positioned in said opening and attached to said second cam arm." The Examiner identifies spindle 88 of Babb as corresponding to the recited split half-round spindle. However, spindle 88 is a square spindle (see Babb Figs. 1C and 3). Babb does not disclose, teach or suggest an operator having a mounting portion and a split half-round spindle, the mounting portion being positioned in the opening and attached to the second cam arm, as recited in claim 27.

Accordingly, claim 27 is believed allowable in its own right.

Claims 15, 24 and 28 were rejected under 35 USC 103(a) as being unpatentable over Babb, Jr. et al. in view of Dancs (U.S. Patent No. 5,513,505).

Applicant believes claims 15, 24 and 28 to be in condition for allowance due to their dependence from their respective base and/or intervening claims. Babb does not disclose, teach or suggest the subject matters of: Applicant's claims 7 and 14 from which claim 15 depends; Applicant's claims 16 and 23 from which claim 24 depends; and Applicant's claims 25 and 27 from which claim 28 depends, and Dancs does not overcome the deficiencies of Babb with respect thereto.

**Applicant's Response to the Examiner's "Response to Arguments" Presented At  
Pages 10-12 of the Present Office Action.**

In the present Office Action, in the paragraph bridging pages 10 and 11, the Examiner states that, "To further clarify the rejection, the examiner points to the spring guides as the spring retention chambers, and the spring engaging surface is the closed end of the spring guide." The Examiner further states in the second full paragraph on page 11 of the present Office Action that, "the examiner points out that the spring guide completely encompasses the spring, and thus provides lateral stability for the spring, wherein the spring retention chamber is disposed between the mounting plate and the slide plate. . . ." (Emphasis added). The Examiner's statements in and of themselves are enough for the present claims not to be anticipated by Babb.

As a first point, Applicant's claims do not recite that "a spring retention chamber is disposed between the mounting plate and the slide plate," which constitutes a separate device positioned between the mounting plate and the slide plate. Rather, and in contrast to Babb, for example, claim 1 specifically recites "a slide plate having a spring retention wall" and a "spring retention chamber established between said spring retention wall of said slide plate and said mounting plate" which constitutes the formation of the spring retention chamber by the spring retention wall of the slide plate and the mounting plate, as clarified in claim 1, as amended. (Emphasis added). Similar language is found in independent claims 4, 7 and 16. Similarly, independent claim 25 recites the "first elongated cavity of said slide plate [i.e, the first elongated cavity defined by a first spring retention wall and having a first spring engaging surface,] cooperating with said mounting plate to define a first spring retention chamber...", which also



constitutes the formation of the spring retention chamber by the spring retention wall of the slide plate and the mounting plate. (Emphasis added).

As recognized by the Examiner, the Babb spring guide completely encompasses the spring. Babb states at column 4, lines 4-7, "Slide plate 70 reciprocates vertically, being biased upwardly by springs 72 which have their upper ends abutting slide shoulders 70a [of slide 70] and their lower ends abutting against the closed lower ends of spring guides 74." Thus, the spring guide that completely encompasses the spring and having the closed lower ends cannot be formed as part of the slide 70, since to do so would render the structure of Babb inoperable. In other words, if the spring guide 74 was part of slide 70, then both ends of the spring 72 would be engaged by slide 70, and no biasing of slide 70 would occur, since the spring would be captive between opposing ends of the slide. Thus, in the arrangement disclosed in Babb, it is necessary for the spring guide that completely encompasses the spring to be separate from the slide 70 in order for the spring 72 to properly apply a bias to slide 70.

Accordingly, Babb does not disclose, teach or suggest an interconnected chassis for a lock set, including a slide plate having a spring retention wall ...; a spring; and said slide plate and said mounting plate having a configuration that forms a spring retention chamber established between said spring retention wall of said slide plate and said mounting plate, said spring retention chamber providing lateral containment of said spring, said spring being positioned in said spring retention chamber between said spring engaging member of said mounting plate and said spring engaging surface of said slide plate", as recited in claim 1, or claims dependent therefrom. Similarly, Babb, does not disclose, teach or suggest the subject matters of independent claims 4, 7, 16 and 25, or claims dependent therefrom.

The Examiner, in the paragraph bridging pages 11 and 12 of the Office Action, states that, “As defined by the applicant, the interior region is located between the first and second cam arm engagement members, where the spring retention member of Babb, Jr. et al. is disclosed between the first cam arm engagement member and the second cam arm engagement member.” However, as further set forth for example, in claim 7, the interior region of the slide plate has a first spring retention wall, wherein a first spring retention chamber is established between the first spring retention wall of the slide plate and the mounting plate. More specifically, claim 7, which is directed to a lock set with an interconnected chassis, recites in part, “a slide plate having .... an interior region located between said first cam arm engagement member and said second cam arm engagement member, said interior region of said slide plate having a first spring retention wall and a first spring engaging surface, ....; a first compression spring; and said slide plate and said mounting plate having a configuration that forms a first first spring retention chamber established between said first spring retention wall of said slide plate and said mounting plate, said first spring retention chamber providing lateral containment of said first compression spring, said first compression spring being positioned in said first spring retention chamber between said first spring engaging member of said mounting plate and said first spring engaging surface of said slide plate.

With respect to the Examiner’s response at page 12, first full paragraph, Babb does not disclose the recited second spring, the second spring retention wall in the slide plate, and the formation of the second spring retention chamber for substantially the same reasons set forth above with respect to claim 1.

Next, in the present Office Action at page 12, second full paragraph, the Examiner responds to Applicant’s contention that Babb does not disclose a spring retaining wall on the slide

plate that defines an elongated cavity in the slide plate by again relying on Babb Fig. 1B. Independent claim 25 recites the “first elongated cavity of said slide plate [i.e, the first elongated cavity defined by a first spring retention wall and having a first spring engaging surface,] cooperating with said mounting plate to define a first spring retention chamber...”, which constitutes the formation of the spring retention chamber by the first elongated cavity of the slide plate and the mounting plate. Dependent claim 11, for example, recites, “The lock set of claim 7, said first spring retention wall defining a first elongated cavity in said slide plate.”

As a first point, nothing in the structure shown in Fig. 1B resembles a spring retention wall defining a first elongated cavity in said slide plate. Merriam-Webster Online defines “cavity” as “an unfilled space within a mass; *especially*: a hollowed-out space” (emphasis added). Referring to Applicant’s Fig. 2, there is shown elongated cavities 136a, 136b which satisfy the definition recited above. However, there is no such corresponding structure in the slide plate 70 or drive plate 104 of Babb Fig. 1B.

As a second point, as recognized by the Examiner, the Babb spring guide completely encompasses the spring. Babb Fig. 1B shows the configuration of the slide 70. What Fig. 1B does not show, however, is the arrangement of slide 70 with respect to the springs, and spring guide 74 which surrounds the spring. This arrangement is clearly shown in Babb Fig. 7, and it is then clear that slide 70 of Babb does not include a spring retention wall.

As set forth above, and which bears repeating now, Babb states at column 4, lines 4-7, “Slide plate 70 reciprocates vertically, being biased upwardly by springs 72 which have their upper ends abutting slide shoulders 70a [of slide 70] and their lower ends abutting against the closed lower ends of spring guides 74.” Thus, the spring guide 74 that completely encompasses the spring and having the closed lower ends cannot be formed as part of the slide 70, since to do

so would render the structure of Babb inoperable. In other words, if the spring guide 74 was part of slide 70, then both ends of the spring 72 would be engaged by slide 70, and no biasing of slide 70 would occur, since the spring would be captive between opposing ends of the slide. Thus, in the arrangement disclosed in Babb, it is necessary for the spring guide that completely encompasses the spring to be separate from the slide 70 in order for the spring 72 to properly apply a bias to slide 70.

### **Conclusion**

For the foregoing reasons, Applicant submits that the present application is in condition for allowance in its present form, and it is respectfully requested that the Examiner so find and issue a Notice of Allowance in due course.

In the event Applicant has overlooked the need for an extension of time, an additional extension of time, payment of fee, or additional payment of fee, Applicant hereby conditionally petitions therefor and authorizes that any charges be made to Deposit Account No. 20-0095, TAYLOR & AUST, P.C.

Should any question concerning any of the foregoing arise, the Examiner is invited to telephone the undersigned at (317) 894-0801.

Respectfully submitted,



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Name of Registered Representative



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Signature

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June 13, 2005

Date